## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

MOBILEMEDI	A IDEAS, LLC	)	
	Plaintiff,	)	Civil Action No. 10-258-SLR-MPT
	V.	)	JURY TRIAL DEMANDED
APPLE, INC.		)	
	Defendant.	)	

## **STIPULATION AND ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties and subject to the approval of the Court that certain deadlines in this action are modified as follows:

- 1. The parties shall exchange lists of those claim terms contained within the asserted claims that they believe need construction and their proposed claim construction of those terms on **September 23, 2011.** The parties shall agree upon and file the Joint Claim Construction Statement on **March 2, 2012**.
- 2. All fact discovery shall be commenced in time to be completed by **October 31, 2011**. Upon the agreement of the parties, certain depositions may take place after the close of fact discovery but before the current March 30, 2012 deadline to depose any trial witnesses.
- 3. Expert reports on issues for which the parties have the burden of proof are due on **January 13, 2012**. Rebuttal expert reports are due **February 13, 2012**. Expert discovery shall be commenced in time to be completed by **March 23, 2012**.

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4. Except as stated above, all other remaining dates in the Court's Scheduling Order (D.I. 17) remain unchanged. The proposed changes will not affect the dates of any

scheduled court conferences, hearings or trial.

Dated: July 26, 2011

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Attorneys for Plaintiff MobileMedia Ideas LLC

SO ORDERED this \_\_ day of \_\_\_\_\_\_\_, 2011.

United States District Judge